

# **EXHIBIT 7**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE FOREIGN EXCHANGE BENCHMARK RATES  
ANTITRUST LITIGATION

No. 1:13-cv-07789-LGS

**DECLARATION IN  
SUPPORT OF THE BANK  
OF TOKYO-MITSUBISHI  
UFJ, LTD.'S  
MOTION TO DISMISS FOR  
LACK OF PERSONAL  
JURISDICTION**

Dominick R. Sabella declares under penalty of perjury pursuant to 28 U.S.C.

§1746 as follows:

1. I am Managing Director and Comptroller of the New York branch of The Bank of Tokyo-Mitsubishi UFJ, Ltd. ("BTMU"). I submit this declaration in further support of BTMU's motion to dismiss the above-captioned action for lack of personal jurisdiction. I have personal knowledge of the facts set forth herein based on my work at BTMU and my review of BTMU's records.
2. BTMU is a financial institution incorporated in Japan under the Company Law. Its headquarters are and have been located at 2-7-1, Marunouchi, Chiyoda-ku, Tokyo, Japan. BTMU's principal place of business is and has been in Japan.
3. Currently, BTMU has over 700 branches in Japan. It has 75 branches, representative or other offices in more than forty other countries around the world as of March 31, 2015.
4. At all relevant times, BTMU has had a single branch in New York.

5. For fiscal years ending March 31, 2011 through March 31, 2015, BTMU had between two and four other branches in the United States and seven to nine other banking or representative offices or agencies. BTMU also had several subsidiaries in the United States.

6. At all relevant times, BTMU's operations in the United States (and, by extension, New York) were small when compared to its global operations.

6.1. For the fiscal year ending March 31, 2011, all of BTMU's branches and offices in the United States generated just 3.72% of BTMU's gross revenue and 7.58% of its ordinary profit.

6.2. For the fiscal year ending March 31, 2012, all of BTMU's branches and offices in the United States generated just 4.22% of BTMU's gross revenue and 7.26% of its ordinary profit.

6.3. For the fiscal year ending March 31, 2013, all of BTMU's branches and offices in the United States generated just 5.6% of BTMU's gross revenue and 6.74% of its ordinary profit.

6.4. For the fiscal year ending March 31, 2014, all of BTMU's branches and offices in the United States generated just 6.74% of BTMU's gross revenue and 5.92% of its ordinary profit.

7. BTMU's operations in the United States (and, by extension, New York) also are small when measured by the number of full-time employees in the United States.

7.1. As of March 2011, there were 1,707 full-time BTMU employees in the United States, or 4.9% of the 34,797 full-time employees of BTMU worldwide.

7.2. As of March 2012, there were 1,641 full-time BTMU employees in the United States, or 4.6% of the 35,480 full-time employees of BTMU worldwide.

7.3. As of March 2013, there were 1,862 full-time BTMU employees in the United States, or 5.1% of the 36,499 full-time employees of BTMU worldwide.

7.4 As of March 2014, there were 2,344 full-time BTMU employees in the United States, or 6.2% of the 37,527 full-time employees of BTMU worldwide.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on November 20, 2015 in New York, New York.



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Dominick R. Sabella